Merton Green Party response to the Merton Local Plan Consultation 2a

The Council declared a climate emergency in July 2019 and committed to making direct council services carbon neutral by 2030, with the aim of the borough as a whole meeting the target by 2050. The Green Party acknowledges the ambitious climate change policy set by the council, particularly pertaining to development and building regulations. However, we have identified notable room for improvement through placing climate policy at the heart of all other policies, adopting joined up thinking in order to identify opportunities for synergy across multiple challenge areas, and generally striving for a holistic, inspiring and sustainable vision for Merton.

The local plan is the plan to take us to 2036, 6 years after the moment currently judged to be the year by which we must have made drastic change in order to avoid the planet warming by over 1.5 degrees. Recent reports have shown that we may be accelerating towards a number of climate tipping points. An example is “Ice albedo”: as the white ice melts into dark sea which absorbs rather than reflects heat the white ice will melt more rapidly.

We believe the plan should be a plan to take the borough as a whole to carbon neutrality by 2030, with ambitious targets to protect and nurture green spaces and wildlife, prioritising the beneficial impact upon climate change of trees and green spaces and increasing canopy cover 10% by 2030 rather than 2050; to reduce energy use, to reduce motor vehicle travel, and encourage a circular economy. We implore the council to expand their working understanding of the circular economy to include all resources, and not just carbon. We ask that Merton council consider the feasibility of revising the split 2030/2050 target.

It is very disappointing to note that there is no reference to tackling the climate emergency in the foreword and introduction to the document, suggesting climate policy to be no more than a piecemeal addition rather than the heart and soul of a vital paradigm change.

General comments on the plan

- Many points are vague, underdeveloped and unconvincing, without any tangible indications of how they will or can be implemented. It reads more like a wish list than a plan.
- Some key principles are riddled with errors, which does not inspire confidence in the process - from planning to execution
- There is a disappointing lack of images, infographics and visualisations. This makes the plan unappealing, hard to understand, and hostile to the public consultation process.
- Merton’s ‘zero carbon’ aspirations are naively scattered throughout the plan. The reality of achieving a zero-carbon society will require nothing short of a revolution of our society and urban structure. It is absolutely critical that prior to any major local development, we are realistic about what zero carbon will look like, and properly plot out a route to achieving this, to ensure that once in a generational opportunities are not missed.

02. Good growth strategy

Credit is given to many of the underpinning principles such as: addressing and levelling out inequality across the borough, avoiding polarisation, meeting a variety of local needs and aspirations. However, there are numerous shortcomings in this section. Many statements are imprecise, vague and sometimes misinformed. Some examples of this follow.

The section is littered with typos. Paragraphs are not numbered. It reads as a draft rather than a well planned, considered strategy.

P2 The challenges we face
"Sustainable growth" is referred to, but it is not clear what this comprises. Does this mean sustained population growth? Sustained economic growth? Green principles are clear that economic growth needs to be decoupled from carbon emissions and environmental degradation, but this is not noted as an ambition, and should be if the council is to take seriously its commitments to the climate emergency. If the aspiration here is towards becoming sustainable in the true sense, this is not clear and poorly realised.

P2 Supply and cost of housing in the borough A dramatic reduction in London's population has occurred following Brexit and the pandemic. We wonder how certain it is that the population will continue to grow and suggest it may be wiser to wait and see what the trends are before agreeing to too many new developments.

P4 Adapting to climate change
These two paragraphs are sloppy: littered with technical blunders. As an example, the section about climate adaptation utterly miscomprehends the issue, as well as noting aspects of climate change that are irrelevant to Merton.

To be clear, the issue of climate change requires actions on two fronts: mitigation, which seeks to reduce contributions to manmade climate change, and adaptation, which recognises that climate change is already having an impact that will only worsen over time, and that it is also necessary implement measures that reduce potential future impacts.

The final sentence "for instance we have a new baseline of what can be achieved" may mean that the agility in responding to the pandemic can be replicated with regard to the climate emergency but it is not clear.

P4 Prioritising walking, cycling and public transport we would underline your point on the link between road traffic and air pollution by noting that air pollution is dangerously high in several areas of the borough: Colliers Wood, Mitcham, Morden, South Wimbledon and Wimbledon, (Merton's Air Quality Annual Status Report for 2019). We note that the 2018 guidance on Health Protection from Public Health England states that "Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy."

A recent inquest in Southwark linked the death of a child (Ella Addoo-Kissi-Debrah) to levels of air pollution for the first time.

We are concerned that encouraging people to cycle, walk and take public transport is not enough and that measures to discourage driving, by increasing the cost of parking, reducing parking spaces, limiting parking on the majority of Merton's roads, limiting the number of parking permits per household, supporting the extension of the Ultra Low Emission zone to Merton, excluding access to parking for developments, are also necessary.

P6 Providing the best start for young people 'Secured by design' and 'hearing the voices of young people'- good principles but lacking in any convincing detail about how these will be implemented.

P7 Good growth strategy We note that although the local authority has a policy of ensuring that affordable housing is included in developments, in practice, as we highlight at each planning application, affordable homes are rarely included and if they are it is at a lower percentage. In 2018/19 only 24% of units in approved schemes were affordable.

P9 Density this paragraph proposes increasing housing density 'where appropriate'. An indication of what the council deems to be 'appropriate' is necessary for a balanced evaluation of this section. Similarly, 'taller buildings' are mentioned, without an indication of what this might translate to in actuality. Increased building height is associated with increased efficiency (and hence lowering of emissions) during the use phase of the building's lifecycle. However, buildings exceeding circa 10 storeys are complex engineering feats, typically requiring dramatically inflated quantities of energy-intensive materials like performance steel and concrete due to the disproportionate strain caused as height increases. As such, these buildings often have unacceptably high embedded energy and carbon, that will take decades to be offset by aforementioned efficiency gains.

Green policy is clear that increasing the height and 'density' of buildings can have some positive environmental impacts - increasing the utility of the land footprint reduces the overall land footprint of the development, releasing space for greening and rewilding - so long as, building height does not exceed 10 storeys. It is also imperative that designs embrace best practice in sustainable construction and use-phase energy efficiency.

P9 and 10 Mixed Use and 20 Minute Neighbourhoods: we applaud the spirit of the notions, if not the substance. Considerable research and thought needs to be applied to capture what the 'needs' of the local communities actually are, and how such mixed developments can effectively address these needs in a joined-up fashion.

P11 and 12 Good growth The 'key diagram' is published with woefully poor quality. It is virtually unreadable.

P13 – 17 Growth areas Dominance of road traffic is noted for town centres such as Morden, but again aspirations to address this are unsubstantiated. Traffic is a type of

dynamic flow system, and measures to alter traffic flow must firmly be grounded in computational models. No aspiration to seek such data or models is stated, suggesting traffic policy will be reactive rather than deliberate, and based on nothing more than instinct.

03. Urban development objectives and vision

Despite numerous noble objectives in this section, the 'vision' is sparse and disappointingly lacking in vision, visuals or anything visionary. The authors and architects need to ask themselves 'why' they want to achieve all this, and what exactly they want life in 2050 (and beyond) to look like. My interpretation is that the overarching vision is (or should be) one of happiness for all and sustainability of society. From there, one can characterise the features of happiness and sustainability, before strategizing how these might be achieved. Local plans developed by other aspirational and inspirational towns and cities across the world, for example Gothenburg, Sweden, have done this in a more intelligent, structured and effective way.

Regarding the stated objectives, whilst well realised urban transitions can deliver benefits across multiple needs, this will only be achievable through thorough multidisciplinary collaboration and ideation at the planning stage. This section is lacking in any statement of intent on this front, risking missed opportunities to alleviate various local problems and needs, and in turn, escalated and inefficient future catch-up spending in subsequent efforts to address them.

SO1

b. While we welcome the ambition 'requiring new buildings to be sustainable' is an imprecise and lazy statement. Sustainability is measured across multiple markers, such as CO2e emissions, resource depletion, aquatic toxicity etc. Reaching absolute sustainability is almost unheard of, and so the council needs to stipulate which indicators it will use, and what benchmarks should be reached.

In the Climate change section **P15 1.1.19** the objective is to make **all** buildings in the borough energy efficient. These two objectives need to be aligned, and some thought given as to how to incentivise residents and business to make their buildings more energy efficient.

c. "Supporting investment in high streets and business areas, providing a platform for businesses and jobs recovery after Covid19 and beyond "

We ask that that the council invests only in businesses which are sustainable and work towards the borough's work towards reducing carbon emissions.

SO2

'Good growth' is not defined. We advocate that this should be reimagined as 'green growth' in which economic activity is decoupled from environmental degradation. As part of this, efficiency and supply chain improvements are insufficient alone (**d)**, and needs to be consolidated with a requirement for all commercial and development partners to have a demonstrable track record of green credentials and eco

performance, as well as incentives that favour businesses that foster creation of high quality, meaningful, green jobs. There is an opportunity to create a vibrant clean greentech business community in Merton that should not be missed, as this is a critical component of a zero carbon society. Whilst carefully cultivated urban environments can indeed serve to inspire, uplift and educate their inhabitants, it is unclear as to whether this is the intention.

SO3
This section is characterised by lack of detail or practical steps. Some specific complaints:
a. Energy use (demand) is not minimised by encouraging local energy generation (supply). This paragraph is erroneous and muddled to the extent of redundancy.
c. provision for resilience to future impacts of climate change (aka adaptation) should indeed be included, but this is redundant unless steps are taken to characterise what specific impacts are likely to be felt in Merton.
d. the hypothetical circular economy cannot be achieved by 'promotion' alone, but must be underpinned by favourable policy and social structures. No tangible steps are suggested for how to reach this elusive and revolutionary goal.

Additional suggestions for improvement include provisions for urban farming and local food production, and the identification of local areas currently subject to significant heat island effects and the subsequent incorporation of counter measures to promote urban cooling

SO4
This section is lacking in detail and fails to adequately characterise a '20 minute neighbourhood'. Given the diversity across the borough, is it surely necessary to capture local opinion about what local services are valued by the local communities and should hence be included in the categorisation. We call for community involvement to be actively sought, in order to actively capture the aspirations of the residents of each neighbourhood, in order to determine what services to include in each 20 minute neighbourhood.

e. efficient use of land needs further qualification, as does 'optimum density'. Landuse and density is a contentious topic - increasing the utility of the land footprint of a building by increasing its height and hence internal square footage reduces the overall land footprint of the development, releasing space for greening and rewilding. However, optimum density must be defined in terms of the trade-off between expected performance during the use phase of the building, and disproportionate increases to embedded energy caused by escalating engineering demands of buildings exceeding 10 storeys.

SO5
This section goes some way to acknowledging the interplay between physical environment and health and wellbeing, yet it fails to embrace the opportunity of urban transitions to genuinely inspire residents and visitors. An urban vision for Merton should at its heart seek to inspire its residents, whilst performing exceptionally in terms of harmony with nature and promotion of wellbeing. In turn, this promotes a collective notion of pride, ownership and care for our local environment. This section would benefit from referring to relevant data on crime,

disability, mental and physical health, and so forth, in order to identify realistic targets for improvement.

Other suggestions for improvement: specific stipulation for minimising use of blue-rich outdoor lighting, in favour of warm lighting profile (2700-3000k range) in order to minimise circadian disruption to residents and wildlife.

P7 Spatial vision for 2036

We support the vision but object to the target of 2050 to become a carbon neutral borough. The local plan is the plan to take us to 2036, 6 years after the moment currently judged to be the year by which we must have made drastic change in order to avoid the planet warming by over 1.5 degrees. Recent reports have shown that we may be accelerating towards a number of climate tipping points. An example is "Ice albedo": as the white ice melts into dark sea which absorbs rather than reflects heat the white ice will melt more rapidly.

We believe the plan should be a plan to take the borough as a whole to carbon neutrality by 2030, with ambitious targets to protect and nurture green spaces and wildlife, prioritising the beneficial impact upon climate change of trees and green spaces and increasing canopy cover 10% by 2030 rather than 2050; to reduce energy use, to reduce motor vehicle travel, and encourage a circular economy. Furthermore we implore the council to expand their working understanding of the circular economy to include all resources, and not just carbon.

Neighbourhoods

04. Colliers Wood

3.1.5 The new public square is a bleak and unwelcoming space and would benefit greatly from the Urban Greening described in the London Plan (London Plan 8.2.5). This would not only improve the look of the area but mitigate air pollution, albeit in a small way.

'Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited.' London Plan 8.5.2

Planters tend to be the response of the Future Merton Team. They can look attractive if maintained, but do not mitigate any of the effects described in the paragraph above.

3.1.18 The previous iteration of the Local Plan stipulated that "Britannia Point should remain the pinnacle building in the centre in terms of height." This sentence has ominously been removed in the current plan. We would ask that 10 storeys be the maximum height for any further developments.
Increased building height is associated with increased efficiency (and hence lowering of emissions) during the use phase of the building's lifecycle. However, buildings

exceeding circa 10 storeys are complex engineering feats, typically requiring dramatically inflated quantities of energy-intensive materials like performance steel and concrete due to the disproportionate strain caused as height increases. As such, these buildings often have unacceptably high embedded energy and carbon, that will take decades to be offset by efficiency gains.

06. Morden

Morden town centre is blighted by the air pollution caused by the traffic, and unwelcoming to cyclists and pedestrians.

We welcome the fact that the Climate Change team has been working with the project to regenerate Morden Town centre in line with the Council's climate goals. We also welcome the fact that the Council was selected for the Foreground Programme run by the UK Green Building Council and we look forward to the results of the workshop with industry experts advising on low carbon solutions for Morden.

development of site Mo3
We object to building on Metropolitan Open Land, this is land protected as an area of landscape, recreation, nature conservation or scientific interest. We understand that housing is a priority but green spaces must be protected in order to ensure a liveable planet in the future.

Please note our comments on tall buildings in Colliers Wood which equally apply here.

07. Raynes Park

N3.4 We ask that the council rethink objectives to prioritise Climate Change, improving air quality and mitigating flood plain risks, through the immediate planting of street trees along Town Centre Coombe Lane and Kingston Road, creating biodiversity corridors.

Raynes Park urgently needs proposals for encouraging active travel, creating improved pedestrianised areas, safe cycling infrastructure and better links between the two shopping areas and between Raynes Park and Wimbledon Town Centres.

We ask that the following areas are prioritised:

- better enforcement/monitoring on Sustainable Drainage Schemes & flood prevention measures
- more protection for existing trees and clearer policies on tree replacement
- more protection for Metropolitan Open Land, Sites of recognised nature conservation, green corridors and Tree Protection Orders
- strengthening guidance on limiting height of buildings

09. Wimbledon

POLICY N3.6 : Wimbledon Town Centre

3.6.2 The Future Wimbledon Supplementary Planning Document identifies that Wimbledon lacks public spaces where ‘residents can dwell, socialise and relax’, and, under Urban Greening & Sustainability, recommends ‘planting species that improve air quality and biodiversity’. We support the suggestion of one of your respondents to plant more street trees in the ground, along the Broadway, creating an urban green corridor.

3.6.5 Greening Wimbledon : ‘adding planters, street trees or climbers to existing spaces is a key priority’, where greening with trees has multiple benefits, from visual and calming appeal, shelter from radiation and rain, to carbon absorption and release of oxygen and water vapour, improving both air quality and humidity.

Please note our comments on tall buildings in Colliers Wood which equally apply here.

10. Climate change

This section starkly contrasts with previous sections insofar as being comprehensive, well-researched and well-referenced. However, the numbering system for the paragraphs is nonsensical due to each number being repeated several times, rather than each paragraph having a unique number. The document is also extremely lengthy and repetitive, suggesting piecemeal production rather than holistic realisation.

We lack extensive experience with the various building codes referenced throughout, but broadly concur with the spirit of the policies.

We welcome Merton’s ambitions to go beyond the London Plan requirements in terms of minimising the carbon footprint of developments, and generally strong position on building regulations.

We note the strong dependence of the net zero carbon strategy on carbon offset schemes, which can be problematic depending on the quality and reputability of the scheme. Carbon auditing is not a precise science, and carbon offset schemes are not a true substitute for reducing carbon emissions at the pipe.

We also note, with some scepticism, the provision that “any carbon shortfall could be provided...off-site provided that an alternative proposal is identified, delivery is certain and subject to agreement with the council.” (**CC8.11-c**) We require further clarification of this scheme, and assurance that this does not open loopholes.

The overall policy makes little attempt to map the overall energy and carbon emission landscape in Merton, and hence cannot attempt to quantify the expected impact of what is proposed as a proportion of the situation today. This makes it hard to assess whether the proposals represent true systemic change, or just the low hanging fruit. The council needs to show, using clear, quantitative graphics, exactly

how these policies fit in with the overall plans to be zero carbon by 2050. The council needs to be clear exactly how each piece of the puzzle fits together, and they need to ensure residents' engagement and compliance at each step of the journey.

The plan is right to highlight the conundrum of energy use intensity, but in our view lacks the creative vision required to engage and educate residents in what steps they can take to reduce their own energy intensity (for example, producing learning resources or online platforms that help them shop for the most efficient white goods). There is also little attempt to characterise the barriers herein, including exploration of why domestic energy intensity is what it is.

We anticipate a knock on of the zero carbon trajectory we are now on to be an increased demand for energy specialists and sustainability consultants but see no provision to ensure creation of sufficient local training and recruitment opportunities. Our local workforce needs to reflect local demand for services. This climate change policy therefore needs to link better with other domains, such as 'Good Growth' and Education and Training.

We are concerned that the council's approach to the hypothetical circular economy pertains only to carbon.

Specific comments:

Policy CC8.11
Net-zero carbon development

1.1.4, 1.1.5 and 1.1.19 We strongly agree that measures to reduce carbon emissions should apply equally to all development; large and small, residential and non-residential, existing buildings as well as new buildings.

P11
1.1.7 The previous point notes that 90% of developments in Merton are built as minor schemes (and are hence exempt from stringent regulations). This clause seeks to expand the categories of planning applications that would be subject to the new rules, but does not indicate what percentage of applications are now expected to be included.

We query to what extent these new rules could be applied to residential home improvement projects. Obstacles to this, such as the availability of suitably qualified/experienced tradespeople, would need to be addressed. We invite the council to explore ways to 'green' our smaller construction businesses and projects, perhaps via training opportunities and financial incentives, and producing readily available informational documents to support renovation projects.

1.1.8 Further to the previous point, we welcome the statement that "carbon offsetting must not be heavily relied upon and should only be considered where further (carbon) savings cannot be achieved on site", but seek clarification on what excuses/reasons for inability to reduce on-site carbon would be accepted by the council.

CC8.12
We support the raising of building regulations in terms of efficiency standards for all proposed development including residential home improvements, but implore that these be rolled out sensitively and supportively, ensuring builders and homeowners alike are not subject to unfounded red tape or penalised by unreasonable costs. A wider programme of education and engagement may be necessary, including access to free advice on how to increase efficiency above and beyond the required levels.

CC8.13
a - no new gas boilers past 2023: we note that where this leads to installation of electric boilers instead, this represents an increase to cost for the user, and increase demand on electricity at a time when the national grid is still relatively carbon intense, especially in the winter when demand for heating is at its highest. We therefore query the timeline for this policy, and require further assurances that issues of affordability among the general population have been properly considered. We also note that the option of increasing the production of biogas (from sources such as anaerobic digestion (AD), which is a carbon neutral, and potentially carbon negative option) is not explored at all. This would offer notable advantages, owing to its compatibility with conventional gas infrastructure.

CC8.14
We query the presence of this policy within the climate change framework, as these are different (highly nuanced, often orthogonal) issues. Muddling the issues sets a concerning precedent as the council should be a beacon of authority and information on these matters. Climate change and the climate emergency relates to CO2e emissions. The circular economy and generation of waste pertains to resource depletion (beyond carbon) and pollution of our terrestrial and aquatic environments. Often, different environmental issues have shared solutions, but conversely, they often do not. For example, reducing plastic packing in fresh produce decreases shelf life and increases food waste, in turn increasing CO2e emissions. Whilst it is acceptable (and indeed preferable) to develop solutions to multiple problems in tandem, we request that in future, these issues are separately framed and clearly differentiated at the outset.

1.1.7 and 1.1.8 We agree that demolition of a single dwelling and replacement by a single dwelling should be discouraged as it is contrary to the principles of sustainable development and the circular economy.

CC8.15
1.1.4 - Similarly, we question whether water management policy belongs in the context of climate policy. Clarification is needed to differentiate between mitigation and adaptation strategies. Adaptation to changing water demand and supply is no doubt a crucial pillar of climate change adaptation policy, but it is not framed in this context (indeed, the following section is titled ‘Adaptation’)

1.1.8 We agree that all developments should include water-saving measures such as rainwater harvesting and greywater recycling.

We recommend the need to include monitoring and retention of green space and trees in private gardens. This is currently being eroded and replaced by extensions and large outbuildings, a result of the relaxation of planning regulations.

The increased impermeable covering of front gardens, with planting replaced by parking and housing of large waste bins, reducing flood mitigation, should also be discouraged.

CC8.16
We welcome the suggestions in this section, but note no attempt has been made to characterise the present situation - for example, identification of heat-island 'hotspots'.

d - We acknowledge the importance of SuDS, but implore the council to facilitate private residential take-up of such measures. A start would be to catalogue the sorts of techniques and alternative options to conventional paving, to enable residents to make informed decisions about their own home improvements.

1.1.6 - this section misses the opportunity to map out overall flood risk in Merton.

11. Economy and Town Centres

- In general, there are some promising policy developments in this section. We support the theme of flexibility and accessibility, but are concerned by the poor link with climate change strategy.
- Incompatibility between the plan being a long term project, Vs the urgent short term recovery from the pandemic. The latter should be explored in the context of the long term plan, and not displace it, but make the most of the opportunity to make changes.
- There is a lack of focus on green jobs. This sector will need concerted expansion as a result of increased demands on sustainability related services stemming from the climate emergency declaration and zero carbon ambitions. An attempt should be made to qualitate and quantify near, mid and long term changes to service demands and use this to inform job creation strategy.
- Sustainable economic development is an oxymoron unless the economy is decoupled from carbon emissions. The council needs to be clear on their intentions herein, as this erroneous language is littered throughout the local plan
- 7.1.5 we applaud this aim
- Changing consumer behaviour – this needs further impetus to ensure new developments have flexible spaces that can easily adapt to change of use
- Pop ups: We would encourage the council to monitor the success of different pop up businesses and use this to inform long term strategy based on demand and viability of different types of enterprise.
- We note the ambitious plans for growth, but query whether these can be managed in the context of the climate change, transport and wellbeing goals.

- We note that some local authorities are issuing green bonds to raise money for sustainable projects and suggest that Merton could consider this.

12. Green and Blue Infrastructure

We support the measures outlined to protect and expand on open spaces, green infrastructure and the natural environment. Our concern is that while the council makes the right statements in relation to the climate emergency it does not act on them. Recent tree felling goes directly against the aims stated in this section. Felling mature trees is damaging to the environment and planting saplings that will not absorb the same amount of CO2 for 50 years is not an alternative. Trees protected in sites of recognised nature conservation (SINC) and Green corridors, or through Tree Protection Orders were not protected at Mitcham/ Bishopsford Bridge, Wyke Road, or 5 Parkside Avenue.

08.04 Tree protection

1.1.54 Where planning proposals involve curtailing the roots or canopy of retained trees, we ask that a higher level of care be ensured by valuing such trees for replacement, if they should die within a time limit of say 2 years. We also ask that a high level of care be ensured in the planting and maintenance of replacement trees, by requiring replanting of dead trees within an appropriate time frame.

We suggest that if special mitigating conditions are a requisite to planning consent an officer is made responsible for ensuring that these conditions are formally recorded and carried out within a reasonable time frame. A good example is the tree planting required as part of the planning consent for the proposed Harris Academy on the High Path estate.

1.1.55 The London Plan advises the use of CAVAT, I-tree Canopy Eco UK and OSCCA as assessment tools for PA Aboriculture assessments. The Green Party asks that Merton adopts these tools when assessing loss and harm, encouraging tree retention and canopy increase.

We ask that when a decision is made by the Council to cut down trees as part of permitted development the full evidence for this decision is made public and is readily available to concerned parties.

Policy 08.6 Urban Greening

The London Plan includes greening of all urban spaces:

‘8.5.2 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited.’

We ask that this wider interpretation of Urban Greening be included in Merton’s plan.

We also ask that the crucial role of street trees, rather than grass or planters, is acknowledged in town centres. In the current climate emergency, trees address the urban heat island effect, pollution, air quality, carbon absorption, providing humidification, oxygen, canopy shelter from rain and radiation and essential biodiversity corridors between pockets of green urban space.

Many people have not yet taken on board the implications of the Climate Emergency and regard tackling it as a choice rather than a necessity. We suggest that Climate Emergency awareness training is provided to officers and councillors.

We suggest that advice could be made available to residents on how to adopt their own greening measures. Examples of incentives could be free plants/planting materials/subsidised green roof kits.

In the same vein we underline the importance of the council, or it's subcontractors, working with local Friends groups who are working hard to improve the green spaces in their neighbourhoods.

08.7 b River Wandle

We ask that there is regular monitoring of water quality, including the presence of pesticides, herbicides, excess fertiliser based nutrients and all chemical and organic pollutants. This should be carried out at least quarterly and also at short notice in case of emergency.

We suggest that the council consult with recognised bodies such as the Wild Trout Trust to decide on priorities when working to make the Wandle a healthy environment for wild fish. Much of the Wandle is in shade which prevents the growth of aquatic plants needed for a healthy environment for invertebrates and fish.

13. Health and well being

We broadly support the aims outlined in this section. However we note that mental health and wellbeing are not mentioned. Access to parks and green spaces, both for exercise and for relaxation, is essential to maintain mental wellbeing. This is a perfect example of the opportunity for synergy between solutions, as things like urban greening if properly realised can have tremendous positive impacts on well being, education, mental health, discouraging antisocial behaviour.

As we mention on p2 of our response we would underline your point on the link between road traffic and air pollution by noting that air pollution is dangerously high in several areas of the borough: Colliers Wood, Mitcham, Morden, South Wimbledon and Wimbledon, (Merton's Air Quality Annual Status Report for 2019).

14. Housing provision

This section does not link with previous sections where the need for developments to be sustainable and energy efficient is mentioned.

Policy No H4.1

e. We welcome the 50% target for affordable homes. We note however that although the local authority currently has a policy of ensuring that 40% affordable housing is included in developments, in practice, as we highlight at each planning application, affordable homes are rarely included and if they are it is at a lower percentage than stipulated. In 2018/19 only 24% of units in approved schemes were affordable.

4.1.1 We fully support the statement that affordable housing needs must be met. Affordability can be further enhanced by bringing building designs up to Passivhaus standards, as these are much cheaper to run.

4.1.11. If there is evidence of a difficulty between viability of projects and affordable homes, the local authority should create a subsidiary scheme to encourage contractors to build affordable homes.

4.1.13 We ask that the council makes a plan to counteract the number of family homes reducing further, but that this does not involve converting maisonette flats to single houses.

Policy No. H4.2

This section should link to other sections on the climate emergency and guarantee sustainable homes. We ask that all new housing is built with sustainable material, as well as ensuring they are suitably insulated. We want to see as many of the new houses built with Solar Panels, to take advantage of natural resources and to offset the carbon emitted by building these new homes. We suggest that building designs meet Passivhaus standards.

Policy No. H4.2

4.3.9 The Green Party advocates promotion of self-build opportunities, where possible.

15. Infrastructure

Whilst we broadly agree with the policies outlined (especially the spirit of coordination, which is lacking elsewhere in the Local Plan), we disagree with the narrative. We query whether the increasing provision of residential housing is (or should be) the primary demand on infrastructure in the borough. The climate emergency urgently requires a paradigm shift in the way we eat, work, travel and manage our homes. Furthermore, the air quality crisis mandates strong action on transforming the way traffic flows through the borough. The increased demand for renewable energy, the need for new active walk and cycle ways, the restructuring of road traffic flows, the management of our waste in keeping with the circular economy, the provision of biodiverse, carbon sequestering ecosystems….the list of changing infrastructure challenges goes on.

16.1.18 Gas and electricity - while we note the necessity for a national strategy to decarbonise the grid, we also note the idiosyncrasy that gas will remain an essential part of the local energy mix for many years, even decades to come. We implore the

council to look at ways to produce and feed in biogas to the grid, and in the interim, to offset the unavoidable carbon emissions from local gas use.

The waste management strategy is promising, but fails to acknowledge that as part of the much-touted circular economy, there can be no waste going to landfill. To achieve this seemingly elusive goal will require rigorous cooperation between policy makers, suppliers, businesses and residents. The present strategy is silent on what the first steps are to be able to reach this goal, and we call for greater ambition and vision herein.

Strategic Policy IN16.1

b) should require highways engineers to be included in the dialogue between service providers and developers as there is currently a disconnect between the needs of tree health, the limited locations for street trees due to random underground utilities and the intrusion of multiple feeder pillars and CCTV. Reference should be made to the Tree Strategy to inform final locations.

16.1.13 Currently feeder pillars disfigure many locations in an uncontrolled fashion. We support the statement that “the installation of digital infrastructure should not result in unacceptable damage to visual amenity or harm to environmentally sensitive features or locations.” We ask that this is made a requirement.

16. Places and spaces in a growing borough

Policy LP D5.1

Placemaking and design

The climate change section mentions the need for a constant application of the principles of energy efficiency and sustainability in the choice and use of materials. This needs to be reflected here.

We ask that **a) i) & iii)** should specifically include the retention and protection of existing trees in addition to the planting of new trees ,rather than generalised ‘landscaping’.

v) should include significant and veteran trees as Merton heritage assets

viii) We ask that the requirement to avoid undermining design by variations include specific mention of trees planted in the ground. It is unsustainable and visually unacceptable to resort to trees being planted in pots due to existing underground utilities (their presence should be determined prior to the proposals stage and relocated to enable trees to be planted in the ground.

The document should make clear reference to the value of trees to the environment through their ecosystem benefits as well as their ‘amenity value’. It should require developments to result in a net increase in tree canopy cover. London Plan and council Tree Strategy should be specifically referenced.

It should be recognised that to increase tree canopy cover and be sustainable, the priority should be the retention and protection of existing trees. Existing trees are currently undervalued in the assessments made when considering planning applications and the notion, too regularly expressed, that existing trees can be 'replaced' is wrong as it takes many new trees to replace the ecosystem and amenity benefits of a mature tree and there is also the loss of tree canopy cover while new trees attain the size of the tree felled.

P3 'Tall buildings' are mentioned, without an indication of what this might translate to in actuality except the classification of being over 6 storeys. Increased building height is associated with increases in efficiency (and hence lowering of emissions) during the use phase of the building's lifecycle. However, buildings exceeding circa 10 storeys are complex engineering feats, typically requiring dramatically inflated quantities of energy-intensive materials like performance steel and concrete due to the disproportionate mechanical strain caused as height increases. As such, these buildings often have unacceptably high embedded energy and carbon, that will take decades to be offset by aforementioned efficiency gains.

Green policy is clear that increasing the height and 'density' of buildings can have some positive environmental impacts - increasing the utility of the land footprint reduces the overall land footprint of the development, releasing space for greening and rewilding - so long as building height does not exceed 10 storeys. It is also imperative that designs embrace best practice in sustainable construction and use-phase energy efficiency.

We implore the council to cap building height at 10 storeys.

We generally support the assurances about design quality, in the **Justification** section but note that herein lies the opportunity to give precedence to buildings which showcase their sustainable credentials (such as green walls and roofs, renewable energy generation, palate of sustainable materials) as a means to inspire and educate local residents and visitors.

Policy D5.2 Urban Design and the public realm
We are broadly supportive of the policy statement, but are disappointed that there are no explicit provisions for:

- Planning around through-walking and cycling routes
- Planning around maximising accessibility for all users (with particular focus on the elderly and disabled).

P11 Public Realm

We suggest that there should be specific mention of:

- the significance of air pollution and proximity to road traffic when considering public safety.
- adequate seating for the elderly and infirm in all public spaces.
- accessibility to public transport.

5.3.14 We agree that gated developments are divisive and support the council in discouraging them.

g) Tree planting, as part of changes to & enhancement of highways & the public realm, should be supported by highways engineers through including more trees and redirecting utilities to accommodate tree planting (included in the cost of development or road improvement works). In addition there is a solution to avoid cluttering streets with parking signs by the adoption of low level signs at the back of footpath. This would protect traditional locations for trees i.e. opposite or in line with party walls in residential streets.

j) the reference to the conversion of front gardens for vehicle parking, should be strengthened with the preparation of a strongly worded SPG for direction/guidance of residents and developers. The extent of paving (whether so called porous or not) should be limited to enable existing trees and soft landscape to be retained or planted with run off directed to soft areas, which in addition would help minimise run-off into the sewage system. Increased monitoring and planning enforcement would be essential in support.

P 14 Policy D5.3

Design considerations in all developments
This should be tied with policy counterparts in climate change, wellbeing, greening and transport. **5.3.20** too could be linked with policies on greening, as private garden space provides valuable opportunity for tree cover and ecosystem services.

We broadly support these principles and in particular would like to emphasise our support for:

ii. Conserve and enhance the natural environment, particularly in relation to biodiversity, wildlife habitats and gardens;

iii. Ensure trees and other landscape features are protected;

P18 5.3.26. Developments should not cause significant adverse impacts on species, habitats and landscape. Back gardens are an important element in the borough's wildlife habitat provision and biodiversity. New developments should provide for sufficient space for new planting or existing planting to grow. They should incorporate opportunities including green roofs, roof gardens, terraces, permeable surfaces, window boxes and climbing plants.

5.3.27 landscape planning conditions require reinforcement to include a management plan and replacement of failures within 5 years to ensure tree and shrub planting establish for long-term benefit. This would improve sustainability, tree canopy cover and bio-diversity as well as the other benefits that greening the borough brings.

P19 5.3.28 applicants will need to demonstrate how their development proposal makes effective use of resources and materials, minimises water use and CO2 emissions is required.

Lighting - We require the commitment to minimise use of blue-rich outdoor lighting, in favour of warm lighting profile (2700-3000k range) in order to minimise circadian disruption to residents and wildlife

Climate change - the separate climate change chapter has comprehensive provisions for development and building regulations. It seems odd and superfluous to include this skeletal mention within this chapter, unless chapters are cross-referenced (they aren't). The current document structure is illogical and muddled, and yet again suggests more attention needs to be paid to joining up thinking.

Policy D5.5 We ask that this should include 'Heritage' trees to be retained, protected and celebrated

b) & c) and the use of Tree Protection Orders extended to cover all 'Heritage' trees in the borough and other significant trees in Conservation areas.

17. Transport and urban mobility

We fully support all the aims in this section: to improve the environment for cyclists and walkers; to manage parking and support; increase transport infrastructure, support for car clubs. However we do not believe that the targets are ambitious enough, as the plan notes ch 17 p 2 "The greatest proportion of carbon emissions are from privately owned petrol and diesel cars."

Another point made in the plan is the dangerous impact of inactivity on health. Advances towards the targets set will meet at least three objectives: reducing air pollution, limiting carbon emissions and helping to increase the activity, and therefore the health, of the population of Merton.

We also note that directly replacing current vehicles with electric vehicles is not the solution. Electric vehicles are responsible for carbon emissions, mainly through the manufacture of the car batteries (possibly 59% higher co2 emissions than an internal combustion engine) but also through tyre and brake particles. We are concerned that encouraging people to cycle, walk and take public transport is not enough and that measures making it harder to drive, by increasing the cost of parking, reducing the number of parking spaces, supporting an extension of the Ultra Low Emission zone to Merton, excluding access to parking for new developments for example, are also necessary.

The reaction to Transport for London's streetspace changes show how carefully the introduction of such changes need to be managed. Nevertheless 36% of households in Merton have no access to a car, and not all those who have access to a car are necessarily unsupportive of measures to reduce air pollution.)

We suggest that the council looks at traffic modelling and projections of the impact of road changes, cycle routes and 20 min neighbourhoods in order to evaluate transport policy.

We refer you to the response from the Merton Residents' Transport Group whose suggestions we fully endorse for detailed comments.

Sustainability Appraisal

We were pleased to note that this had been completed, but disappointed that the presentation of the document is unintuitive and cumbersome. It should have been possible to fit all strategic objectives SO1-SO22 in the horizontal column. In current form it is exceptionally difficult to evaluate. The appraisal for each SO should also be included in the relevant chapters, to ensure transparency and clarity.

Merton Green Party 01 February 2021